IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

HAWAII STRUCTURAL IRONWORKERS : No. 1:18-cv-00299-AJN-SLC

PENSION TRUST FUND, Individually and on

v.

Behalf of All Others Similarly Situated, : Final Approval Hearing: : February 10, 2022 at 3:00 PM

Plaintiff,

.

AMC ENTERTAINMENT HOLDINGS, INC.,

et al.,

Defendants. : January 6, 2022

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Lead Plaintiff, the International Union of Operating Engineers Pension Fund of Eastern Pennsylvania and Delaware ("Operating Engineers" or "Lead Plaintiff"), and Additional Plaintiff, Hawaii Iron Workers Pension Trust Fund ("Hawaii Iron Workers" or "Additional Plaintiff" and, together with Lead Plaintiff, "Plaintiffs"), on behalf of the Class, hereby move ("Motion"), pursuant to Federal Rule of Civil Procedure 23, for entry of an order finally approving the Settlement set forth in the Stipulation and Agreement of Settlement dated November 1, 2021 (the "Stipulation"). ¹

For the reasons set forth in the Stipulation, the Memorandum of Law in support of this Motion, and all supporting papers, as well as the record in this litigation, Plaintiffs respectfully submit the Settlement is fair, adequate, and reasonable, and meets the standard for approval.

¹Capitalized terms not otherwise defined herein shall have the same meaning as in the Stipulation (ECF No. 214-1).

Accordingly, Plaintiffs respectfully request that the Court enter the [Proposed] Order and Final Judgment filed on November 1, 2021 (Dkt. 214-6).

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of this Motion.

Dated: January 6, 2022

Respectfully submitted,

MILLER SHAH LLP

/s/Laurie Rubinow

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